MAR 0 7 2012

NB: CNR

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F.# 2011R00870 OCDETF#: NYE-674H

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK LONG ISLAND OFFICE

UNITED STATES OF AMERICA

- against -

JOSE PEREZ,

also known as "Jay," "Ule"

and "Fat Boy,"

NORBERTO RODRIGUEZ,

also known as "JR,"

WILFRED CASTILLO,

also known as "E" and "EZ,"

JOSE TAVERAS,

also known as "Junior,"

RAFAEL PICHARDO,

also known as "Ralphy,"

WILLIAM BAEZ,

also known as "Billy,"

EDWIN ADAMES,

LEONARDO LOPEZ,

also known as "Leo,"

SEAN BRUNETTE,

also known as "White Boy,"

ANDERSON TAVERAS,

also known as "Andy,"

KENNETH SUAREZ,

also known as "Kenny,"

ERIC SUAREZ,

DANA SOLLECITO,

TINA CATRINI,

also known as "Tina Bonghi,"

MATTHEW CATRINI,

JOSEPHINE JAVIS,

also known as "Josephina,"

ROLAND STERN,

also known as "Pops,"

COREY STERN,

KATHRYN PAPPAS and

FELIX VARGAS,

also known as "Pun" and "Bori,"

Defendants.

INDICTMENT

21, U.S.C.,

841(b)(1)(A)(i), 846, 853(a) and 853(p); T. 18, U.S.C., §§ 3551 et seq.)

SPATT, J.

BROWN, M. J.

THE GRAND JURY CHARGES:

CONSPIRACY TO DISTRIBUTE HEROIN

In or about and between February 1, 2009 and March 7, 2012, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants JOSE PEREZ, also known as "Jay," "Ule" and "Fat Boy," NORBERTO RODRIGUEZ, also known as "JR," WILFRED CASTILLO, also known as "E" and "EZ," JOSE TAVERAS, also known as "Junior," RAFAEL PICHARDO, also known as "Ralphy," WILLIAM BAEZ, also known as "Billy," EDWIN ADAMES, LEONARDO LOPEZ, also known as "Leo," SEAN BRUNETTE, also known as "White Boy," ANDERSON TAVERAS, also known as "Andy," KENNETH SUAREZ, also known as "Kenny," ERIC SUAREZ, DANA SOLLECITO, TINA CATRINI, also known as "Tina Bonghi," MATTHEW CATRINI, JOSEPHINE JAVIS, also known as "Josephina," ROLAND STERN, also known as "Pops," COREY STERN, KATHRYN PAPPAS and FELIX VARGAS, also known as "Pun" and "Bori," together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved one kilogram or more of a substance containing heroin, a Schedule I controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(A)(i); Title 18, United States Code, Sections 3551 et seq.)

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CRIMINAL FORFEITURE ALLEGATION

- 2. The United States hereby gives notice to the defendants that, upon conviction of the above-charged offense, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.
- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value;
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any

other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

TAMILION MCMUNIS

LORETTA E. LYNCH UNITED STATES ATTORNEY EASTERN DISTRICT OF NEW YORK

ACTING UNITED STATES ATTORNEY

F. #2011R00870

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UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

VS.

JOSE PEREZ, also known as "Jay," "Ule" and "Fat Boy," NORBERTO RODRIGUEZ, also known as "JR," WILFRED CASTILLO, also known as "E" and "EZ," JOSE TAVERAS, also known as "Junior," RAFAEL PICHARDO, also known as "Ralphy," WILLIAM BAEZ, also known as "Billy," EDWIN ADAMES, LEONARDO LOPEZ, also SUAREZ, DANA SOLLECITO, TINA CATRINI, also known as "Tina Bonghi," MATTHEW CATRINI, JOSEPHINE JAVIS, also known as "Josephina," ROLAND STERN, known as "Leo," SEAN BRUNETTE, also known as "White Boy," ANDERSON TAVERAS, also known as "Andy," KENNETH SUAREZ, also known as "Kenny," ERIC also known as "Pops," COREY STERN, KATHRYN PAPPAS and FELIX VARGAS, also known as "Pun" and "Bori," Defendants.

INDICTMENT

(T. 21, U.S.C., §§ 841(b)(1)(A)(i), 846, 853(a) and 853(p); T. 18, U.S.C., §§ 3551 et seq.)

Bail, \$		of March 1.D. 20 12	Filed in open court this day,	Joshune Mchanty	A tryactiff 7
 	Clerk			Foreman	. 7

Charles N. Rose, Assistant U.S. Attorney (631-715-7844)